REMARKS

The final Office Action mailed April 7, 2006 has been carefully reviewed and the foregoing amendments have been made in consequence thereof.

Claims 1, 3-9, 11-14, 16-26, and 28-45 are now pending in this application. Claim 23 stands objected to. Claims 1, 3-9, 11-14, 16-26, and 28-45 stand rejected.

Entry of this amendment is proper under 37 CFR § 1.116 since the amendment: (a) places the application in condition for allowance for the reasons discussed herein; (b) does not raise any new issue requiring further search and/or consideration as the amendment relates to issues previously discussed throughout prosecution; (c) satisfies a requirement of form asserted in the Office Action; (d) does not present any additional claims without canceling a corresponding number of finally rejected claims; and (e) places the application in better form for appeal, should an appeal be necessary. The amendments herein are necessary and were not earlier presented because they are made in response to arguments raised in the final Office Action. Entry of this amendment is thus respectfully requested.

The objection to Claim 23 as being of improper dependent form for failing to further limit the subject matter of a previous claim is respectfully traversed.

Claim 23 is amended to further limit the subject matter recited in independent Claim 19. Specifically, Claim 23 is amended to clarify that a product configuration panel further displays each product configuration answer. Support for such features is found throughout Applicants' specification, for example in Figures 3 and 4. No new matter has been added.

For at least the reason set forth above, Applicants respectfully request that the objection to Claim 23 be withdrawn.

The rejection of Claims 38-41 under 35 U.S.C. § 112 is respectfully traversed.

Claims 38-41 are amended to recite "A computer according to Claim 19" only to correct informalities, and thus are not narrowed by such amendments. No new matter has been added.

For at least the reason set forth above, Applicants respectfully request that the Section 112 rejection of Claims 38-41 be withdrawn.

The rejection of Claims 1, 3-9, 11-14, 16-26, and 28-45 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 6,035,283 to Rofrano (hereinafter referred to as "Rofrano") in view of U.S. Patent 6,012,051 to Sammon, Jr. et al. (hereinafter referred to as "Sammon"), and further in view of U.S. Patent 5,754,850 to Janssen (hereinafter referred to as "Janssen") is respectfully traversed.

Rofrano describes a method and system for employing an electronic catalog to assist and guide customers to products they will most likely be interested in purchasing. The system is started by a customer initiating a potential electronic catalog purchase (200) by asking for assistance (201). The system then presents a question and corresponding answers. After the customer selects an answer (203), the system may then ask a further question (204) to be answered by the customer. When the customer has answered all questions, remaining products that meet all criteria are presented in a list or by a side-by-side comparison. In other words, the system presents a list of associated products based on the answers selected by the customer. Notably, Rofrano does not describe that the system displays **each of** the product list, the questions, and the answers in a **same display page**, but rather describes displaying a question and answer combination in a **different screen** than a product list display.

Sammon describes a method and system for assisting users in making complicated choices among a set of products in a product domain. The system presents a sequence of input prompts to gather user preference and requirement data for the products in the product domain. A decision engine of the system then filters the product domain to present a list of products based on user answers to the input prompts.

As shown in Figure 4, the system includes a user interface/display screen having a Region (A), a Field (C), and a Region (E). The Region (A) includes a title indicating a topic of a prompt screen, e.g., Performance screen, in which a user will make choices and specify requirements. The Field (C) includes user input widgets in which the user inputs, e.g., by moving a slider bar, a choice or a requirement specification in response to a corresponding response "Category". The Region (E) includes a navigation window having a set of user selectable input tabs (200, 201, 202, 203, 204, and 205). Each tab (200, 201, 202, 203, 204, and 205) indicates a different type of available prompt screen. For example, the tab (204) corresponds to a Performance screen. Therefore, the Performance screen shown outside of and on the right-hand side of Region (E) is presented if the tab (204) is selected by the user.

The display screen also includes a specified exact field having a check box in Region (D). If the check box is selected by the user to provide more detailed requirements, a **different display screen** is presented to interface with the user. As shown in Figure 14, for example, the set of user selectable input tabs (200, 201, 202, 203, and 205) remain the same. However, the previous input tab (204) has been replaced with a new "Performance – Set Specific" tab. Also, the Region (A) has been changed to include a new title indicating a topic of a new prompt screen corresponding to the new selected tab. Further, the Field (C) has been changed to include new response categories and new corresponding user input response options associated with the new tab selected. Notably, Sammon does not describe that the system displays both the previous response category/question and the new response category/question in a **same display page**, but rather describes displaying the previous response category/question and the new response category/question in **different display screens.**

Janssen describes a method and system for assisting users for searching a real estate database for items satisfying specific home features selected by the user. The user of the system selects search features from displayed selection screens such as, for example, a selection display screen (300) shown in Figure 3. The screen (300) includes a question that is

asked to the user, e.g., "What's the Maximum Price?". The screen (300) also includes selection icons (310) that the user selects to provide an answer in response to the question. Further, the screen (300) includes a portion (320) that lists all previous searched features selected by the user in selection display screens that were previously displayed to the user.

For example, the selection icon (310) corresponding to "$350,000" is selected by the user from the screen (300) shown in Figure 3. In response to the user's selection, a new display screen (300) shown in Figure 4 is displayed to the user. The new display screen (300) of Figure 4 includes a new portion (320) having an additional entry of $350,000. After the completion of each search cycle, the search system (100) displays a result display screen containing information on items from the search result. Notably, the system does not display a list of product results and the previously displayed question of Figure 3 in a **same display page** as the new question, the new response options, and the previous responses as shown in Figure 4. Rather, the system displays the previous question and a product result list as separate screens that are **different screens** than a screen displaying the new question, the new response options, and the previous answers.

Claim 1 recites a computer-implemented method for product selection assistance, the method including "receiving a product category selection; processing the received product category selection using the computer by matching the product category selection against a product database to determine a plurality of matched products; displaying a product matrix comprising a product entry for each of the matched products, each product entry comprising a model identifier and at least one product configuration parameter associated with the matched products; presenting a product configuration question relating to the at least one product configuration parameter displayed in the product matrix, wherein said presenting the product configuration question comprises presenting the product configuration question associated with a selected product configuration parameter chosen from the at least one product configuration parameter; receiving a product configuration answer; processing the product configuration answer using the computer by responsively updating the product matrix based

on the product configuration answer to eliminate at least one product entry in the product matrix, wherein said processing the product configuration answer by responsively updating comprises removing the selected product configuration parameter from the product matrix and displacing the selected product configuration parameter and the product configuration answer to a visible location outside the product matrix; and displaying the updated product matrix, the previous product configuration question, and a new product configuration question in a same display page."

None of Rofrano, Sammon and Janssen, considered alone or in combination, describes or suggests a computer-implemented method for product selection assistance as recited in Claim 1. Specifically, none of Rofrano, Sammon, and Janssen, considered alone or in combination, describes or suggests a method including displaying an updated product matrix, a previous product configuration question, and a new product configuration question in a same display page, as required by Applicants' claimed invention. Rather, in contrast to the present invention, Rofrano describes a question and answer combination in a **different screen** than a product list display. Sammon describes displaying a previous response category/question and displaying a new response category/question in **different display screens**. Janssen describes displaying a previous question and a product result list as separate screens that are **different screens** than a screen displaying a new question, a new response options, and previous user answers. Accordingly, for at least the reasons set forth above, Claim 1 is submitted to be patentable over Rofrano in view of Sammon, and further in view of Janssen.

Claims 3-9, 11-13, and 30-33 depend, directly or indirectly, from independent Claim 1. When the recitations of Claims 3-9, 11-13, and 30-33 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 3-9, 11-13, and 30-33 likewise are patentable over Rofrano in view of Sammon, and further in view of Janssen.

Claim 14 recites a product selection assistance tool including "a communication interface; a processing circuit coupled to the communication interface; and a memory coupled

to the processing circuit, the memory storing, for execution by the processing circuit, instructions for: receiving a product category selection over the communication interface; matching the product category selection against a product database to determine a plurality of matched products; displaying a product matrix comprising a product entry for each of the matched products, each product entry comprising a model identifier and at least one product configuration parameter associated with the matched products; presenting a product configuration question related to the at least one product configuration parameter displayed in the product matrix; receiving a product configuration answer; responsively updating the product matrix based on the product configuration answer to eliminate at least one product entry in the product matrix, the product configuration question based on a selected product configuration parameter chosen from the at least one product configuration parameter, wherein the instructions for responsively updating include instructions to remove the selected product configuration parameter from the product matrix and instructions for displacing the selected product configuration parameter and the product configuration answer to a visible location outside the product matrix; and displaying the updated product matrix, the previous product configuration question, and a new product configuration question in a same display page."

None of Rofrano, Sammon and Janssen, considered alone or in combination, describes or suggests a product selection assistance tool as recited in Claim 14. Specifically, none of Rofrano, Sammon, and Janssen, considered alone or in combination, describes or suggests a product selection assistance tool including a memory storing instructions for displaying an updated product matrix, a previous product configuration question, and a new product configuration question in a same display page, as required by Applicants' claimed invention. Rather, in contrast to the present invention, Rofrano describes a question and answer combination in a **different screen** than a product list display. Sammon describes displaying a previous response category/question and displaying a new response category/question in **different display screens**. Janssen describes displaying a previous question and a product result list as separate screens that are **different screens** than a screen

displaying a new question, a new response options, and previous user answers. Accordingly, for at least the reasons set forth above, Claim 14 is submitted to be patentable over Rofrano in view of Sammon, and further in view of Janssen.

Claims 16-18 and 34-37 depend directly from independent Claim 14. When the recitations of Claims 16-18 and 34-37 are considered in combination with the recitations of Claim 14, Applicants submit that dependent Claims 16-18 and 34-37 likewise are patentable over Rofrano in view of Sammon, and further in view of Janssen.

Claim 19 recites a computer including "a processing circuit; and a memory coupled to said processing circuit, wherein said memory stores, for execution by said processing circuit, instructions for: displaying, on at least one of said computer and another computer connected to said computer over a network, a matrix panel comprising a product matrix displaying a plurality of products using individual product entries comprising a model identifier and at least one product configuration parameter associated with the products; and displaying, on at least one of said computer and the other computer, a product configuration panel displaying a product configuration question and accepting a product configuration answer, the product matrix responsively updating based on the product configuration answer to eliminate at least one product entry in the product matrix, wherein the product configuration question relates to the at least one product configuration parameter displayed in the product matrix, the product configuration question based on a selected product configuration parameter chosen from the at least one product configuration parameter, and wherein the product matrix is responsively updated by removing the selected product configuration parameter from the product matrix and by displacing the selected product configuration parameter and the product configuration answer to a visible location outside the product matrix; and displaying, on at least one of said computer and the other computer, the updated product matrix, the previous product configuration question, and a new product configuration question in a same display page."

None of Rofrano, Sammon and Janssen, considered alone or in combination, describes or suggests a computer as recited in Claim 19. Specifically, none of Rofrano,

Sammon, and Janssen, considered alone or in combination, describes or suggests a computer including a memory storing instructions for displaying on at least one of said computer and the other computer, an updated product matrix, a previous product configuration question, and a new product configuration question in a same display page, as required by Applicants' claimed invention. Rather, in contrast to the present invention, Rofrano describes a question and answer combination in a **different screen** than a product list display. Sammon describes displaying a previous response category/question and displaying a new response category/question in **different display screens**. Janssen describes displaying a previous question and a product result list as separate screens that are **different screen** than a screen displaying a new question, a new response options, and previous user answers. Accordingly, for at least the reasons set forth above, Claim 19 is submitted to be patentable over Rofrano in view of Sammon, and further in view of Janssen.

Claims 20-24 and 38-41 depend from independent Claim 19. When the recitations of Claims 20-24 and 38-41 are considered in combination with the recitations of Claim 19, Applicants submit that dependent Claims 20-24 and 38-41 likewise are patentable over Rofrano in view of Sammon, and further in view of Janssen.

Claim 25 recites a computer program product including "a storage medium readable by a processing circuit and storing for execution by the processing circuit: instructions for receiving a product category selection; instructions for matching the product category selection against a product database to determine a plurality of matched products; instructions for displaying product matrix comprising a product entry for each of the matched products, each product entry comprising a model identifier and at least one product configuration parameter associated with the matched products; instructions for presenting a product configuration question related to the at least one product configuration parameter displayed in the product matrix, wherein said instructions for presenting include instructions configured to present the product configuration question associated with a selected product configuration parameter chosen from the at least one product configuration parameter; instructions for

receiving a product configuration answer; instructions for responsively updating the product matrix based on the product configuration answer to eliminate at least one product entry in the product matrix, wherein the instructions for responsively updating include instructions configured to remove the selected product configuration parameter from the product matrix and instructions configured to displace the selected product configuration parameter and the product configuration answer to a visible location outside the product matrix; and instructions for displaying the updated product matrix, the previous product configuration question, and a new product configuration question in a same display page."

None of Rofrano, Sammon, and Janssen, considered alone or in combination, describes or suggests a computer program product as recited in Claim 25. Specifically, none of Rofrano, Sammon, and Janssen, considered alone or in combination, describes or suggests a computer program product including a storage medium readable by a processing circuit and storing for execution by the processing circuit instructions for displaying an updated product matrix, a previous product configuration question, and a new product configuration question in a same display page, as required by Applicants' claimed invention. Rather, in contrast to the present invention, Rofrano describes a question and answer combination in a **different screen** than a product list display. Sammon describes displaying a previous response category/question and displaying a new response category/question in **different display screens**. Janssen describes displaying a previous question and a product result list as separate screens that are **different screens** than a screen displaying a new question, a new response options, and previous user answers. Accordingly, for at least the reasons set forth above, Claim 25 is submitted to be patentable over Rofrano in view of Sammon, and further in view of Janssen.

Claims 26, 28, 29, and 42-45 depend directly from independent Claim 25. When the recitations of Claims 26-29 and 42-45 are considered in combination with the recitations of Claim 25, Applicants submit that dependent Claims 26, 28, 29 and 42-45 likewise are patentable over Rofrano in view of Sammon, and further in view of Janssen.

Moreover, Applicants respectfully submit that the Section 103 rejections of Claims 1, 3-14, 16-26, and 28-45 are not proper rejections. As is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. None of the cited art, considered alone or in combination, describes or suggests the claimed combination. Further, in contrast to the Examiner's assertion within the Office Action, Applicants respectfully submit that it would not be obvious to one skilled in the art to combine the cited art because there is no motivation to combine the references suggested in the cited art itself. Specifically, none of the applied references describes or suggests displaying the updated product matrix, the previous product configuration question, and a new product configuration question in a same display page, as required by Applicants' claimed invention.

As the Federal Circuit has recognized, obviousness is not established merely by combining references having different individual elements of pending claims. Ex parte Levengood, 28 U.S.P.Q.2d 1300 (Bd. Pat. App. & Inter. 1993). MPEP §2143.01. Rather, there must be some suggestion, outside of Applicants' disclosure, in the prior art to combine such references, and a reasonable expectation of success must be both found in the prior art, and not based on Applicants' disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion nor motivation to combine the prior art disclosures, nor any reasonable expectation of success has been shown.

Further, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejection is based on a combination of teachings selected from multiple patents in an attempt to arrive

at the claimed invention. Because there is no teaching or suggestion in the cited art for the combination, the Section 103 rejection appears to be based on a hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible, and for this reason alone, Applicants request that the Section 103 rejection of Claims 1, 3-9, 11-14, 16-26, and 28-45 be withdrawn.

For at least the reasons set forth above, Applicants respectfully request that the Section 103 rejection of Claims 1, 3-9, 11-14, 16-26, and 28-45 be withdrawn.

In view of the foregoing remarks, this application is believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully submitted,

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